

### **REMARKS**

The Office Action mailed June 28, 2007, has been reviewed and these remarks are responsive thereto. Claims 1, 2, 4-16, 18, 19, 21, 23-25, 28, 30, and 31 remain pending in this application and currently stand rejected. Claims 1, 4, 12, 16, 19, 24, 25, 28, 30, and 31 have been amended. Claims 14, 15, and 23 have been cancelled without prejudice or disclaimer. No new matter has been added.

#### ***Interview Summary***

A telephonic interview was held between the Examiner and the Applicants' Attorney on December 14, 2007. The Examiner's accommodation of the interview and constructive comments are appreciated. The Attorney pointed out distinguishing features of the amended claims over the cited references and the support for the amendments in the Specification. The Examiner indicated that she will take the amendments into consideration in further examination of the application upon submittal of the response.

#### ***Claim Rejections Under 35 U.S.C. §112***

Claims 12-15 and 28-30 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. According to the Office Action, the "determine whether each of the plurality of recognizer program modules are used on the product string in the electronic document in a subsequent instance" element contained in these claims is not described in the Specification in such a way as to enable one skilled in the art to make and/or use the invention.

Independent claims 12 and 28 have been amended to clarify the claimed subject matter. The amendments have also modified the referenced elements of the independent claims. The

amendments are supported by the Specification (page 7, lines 4-9 and page 27, lines 23-28). Applicant respectfully submits that the amended independent claims 12, 28, and their respective dependent claims are in compliance with 35 U.S.C. § 112.

***Claim Rejections Under 35 U.S.C. §103***

**Claims 1, 2, 4-6, 16, 18, 23-25, 28, 30 and 31**

Claims 1, 2, 4-6, 16, 18, 23-25, 28, 30 and 31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Pandit (U.S. Patent No. 5,859,636) (hereinafter *Pandit*) in view of Perkowski (U.S. Patent No. 6,625,581 B1) (hereinafter *Perkowski*), and further in view of Gupta et al. (U.S. Application Publication No. 2001/0042098) (hereinafter *Gupta*). Applicant respectfully traverses the rejections.

Amended claim 1 recites for an electronic system for creating and editing an electronic document, a computer-implemented method for providing electronic commerce actions comprising, *inter alia*, “in each of the plurality of recognizer plug-ins, recognizing at least a portion of the string of text by annotating the string of text to determine a type label when the string includes any of a plurality of predetermined strings”, “associating each label with the string of text, wherein each recognized string of text, its associated type label, and an associated download Uniform Resource Locator (URL) address form a semantic category, the URL address being for downloading actions associated with the semantic category, and wherein the type labels are stored along with the electronic document”, and “providing a list of actions that may be performed to purchase a product associated with the string of text based on the semantic category of the string of text, wherein the list of actions is dynamically generated based on the

semantic category of the string of text for each type label of the semantic category and provided in response to a user selecting a dropdown menu associated with each type label.”

Amended claim 16 recites a computer-implemented method for purchasing a plurality of items from an e-commerce retailer comprising, *inter alia*, “identifying the plurality of items in an electronic document by a plurality of recognizer modules on a user’s computer, wherein each of the plurality recognizer modules receives the plurality of items, recognizes the plurality of items by annotating the plurality of items to determine a label, and associates each label with the plurality of items each recognized item, its associated label, and a URL of the e-commerce retailer forming a semantic category, wherein the plurality of items are identified as matching at least one term in a product database, and wherein the plurality of items are already entered in the electronic document prior to being identified”, “providing, in association with at least one of the identified plurality of items based on the associated label and its semantic category, an action to buy all of the identified plurality of items, wherein the action is associated with a dynamically generated list of actions”, and “sending a list of the identified plurality of items to a web site associated with the e-commerce retailer a URL of the web site also being part of the semantic category of the recognized item associated with the selected action.”

Amended claim 28 recites a computer-implemented method for recognizing a product string in an electronic document, the method comprising, “in each of a plurality of recognizer program modules, determining whether a product string in the electronic document matches at least one string in a recognizer database”, “ if so, then labeling the product string with a semantic category associated with each of the plurality of recognizer program modules, wherein the semantic category comprises a type label and a globally unique product identifier (GUID), wherein the type label is stored along with the electronic document, and wherein the GUID

uniquely identifies the recognition event of the product string”, “ providing a plurality of actions based on the type label and the semantic category of each product string”, and “passing the GUID to a web site associated with a provided action of the plurality of actions such that instances of the provided action are tracked.”

Thus, these independent claims include similar elements with individual and novel variations. As discussed below, the cited references, together or individually, do not teach or suggest all of the elements of either of these independent claims. The amendments to claims 1, 16, and 28 are supported by the Specification (See: page 7, lines 4-9; page 24, lines 10-14; and page 27, lines 23-28).

Unlike the Applicant’s amended claim 1, *Pandit* teaches selectively recognizing text and performing relevant operations based on the recognition. (*Pandit*, Abstract, col. 2, lines 3-4) According to *Pandit*, subroutines of a library recognize a class or type of text data, identify a particular number of operations that can be performed, and perform the identified operation. (*Pandit*, col. 3, line 36 through col. 4 line 19) Thus, *Pandit* fails to disclose or teach recognizing a string of text by annotating the string to determine a type label, where each recognized item and the associated label form a semantic category or providing a list of actions to purchase a product associated with the string based on the semantic category of the string, the list being generated for each type label as recited in claim 1. *Pandit* similarly fails to teach or suggest recognizing a plurality of items by annotating the items to determine a label or providing an action to buy the items based on the associated label and its semantic category as recited in claim 16. *Pandit* further fails to teach or suggest labeling a product string with a semantic category associated with recognizer program modules, where the semantic category includes a type label

and a globally unique product identifier (GUID), the type label being stored along with the electronic document as recited in claim 28.

Indeed, *Pandit* teaches away from the present application by disclosing recognition of a class or type of text data, identifying a number of operations based on the recognition, and performing the operations (*Pandit*, col. 3, line 36 through col. 4 line 19). Thus, according to *Pandit* each string of text in a document would need to be re-recognized before a relevant operation can be performed since type labels associated with the strings are not disclosed. Applicant's amended claims 1, 16, and 28 enable execution of actions associated with the type labels at any time by any application without having to recognize sections of the electronic document again each time. Contrary to the allegation by the Office Action, the highlighting or italicizing of recognized text as disclosed in *Pandit* is not equivalent to associating recognized items with a type label that is stored in the document and actions being provided based on the type label (or label) subsequently.

*Perkowski* discloses a method and apparatus for collecting product-related information and transmitting and delivering the same between the manufacturers and retailers of products to the consumers thereof in retail shopping environments as well as at home, work and on the road. (See *Perkowski* column 4 lines 36-44.) *Perkowski* discloses a method of carrying out electronic-type commercial transactions involving the purchase of products which are advertised on the Internet at uniform resource locations (URLs) that are registered with the IPI system. (See *Perkowski* column 7 lines 12-17.)

While *Perkowski* may mention electronic-type commercial transactions, *Perkowski* also fails to teach or suggest recognition of strings of text, plurality of items, or product strings by annotating them, associating labels (or type labels) which are part of a semantic category

associated with these recognized items, and providing actions based on the labels or semantic category of the labels as recited in claims 1, 16, and 28 with different variations.

*Gupta* discloses a network system that includes a client computer that can present multimedia content to a user and an annotation server that can transmit, to the client computer, annotations for the multimedia content. (See *Gupta* paragraph [0011].) *Gupta* discloses an annotation entry 180 includes an author field 182, a time range field 184, a time units field 186, a creation time field 188, a title field 190, a content field 192, an identifier field 194, a related annotation identifier field 196, a set identifier(s) field 198, a media content identifier field 200, and an arbitrary number of user-defined property fields 202. (See *Gupta* paragraph [0057].)

*Gupta* fails to teach or suggest the above discussed features of claims 1, 16, and 28 involving type labels (or labels) and semantic categories in providing actions to a user based on recognized items in an electronic document. Instead, *Gupta* discloses a metadata store that contains annotation entries. An annotation entry is not a list of actions provided based on a type label or a semantic category of a type label generated by recognizing a string of text.

Furthermore, the three references also fail to suggest unique elements of the independent claims 1, 16, and 28 such as each recognized string of text, its associated type label, and an associated download Uniform Resource Locator (URL) address forming a semantic category; the URL being associated with a web site of an e-commerce retailer to which a list of identified (recognized) items is sent; and the semantic category comprising a globally unique product identifier (GUID) which is passed to a web site associated with a provided action of the plurality of actions such that instances of the provided action are tracked.

Thus, *Pandit*, *Perkowski*, and *Gupta* fail to teach, suggest, or hint several features of the independent amended claims 1, 16, and 28, and the claims are not rendered obvious by the three references, individually or in combination. Notice to that effect is respectfully requested.

Claims 2-6, 18, and 30-31 depend from independent claims 1, 16, and 28, respectively. Therefore, dependent claims 2-6, 18, and 30-31 are also allowable at least for the reasons described above regarding independent claims 1, 16, and 28 by virtue of their dependency upon the independent claims and by virtue of their additional limitations. Claims 23 and 25 have been cancelled without prejudice or disclaimer.

Claims 7-15, 19, and 21

Claims 7-15, 19 and 21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Pandit* in view of *Perkowski* and Jovicic et al. (U.S. Patent No. 5,855,007) (hereinafter *Jovicic*), and further in view of *Gupta*. Applicant respectfully traverses the rejections.

Claims 7-11 depend from amended independent claim 1 with additional features. As discussed above, claim 1 is not rendered obvious by *Pandit*, *Perkowski*, and *Gupta*. *Jovicic*, which discloses an electronic coupon communication system, does not disclose the above discussed elements of claim 1 either. Therefore, claims 7-11 are allowable at least for the reasons described above regarding independent claim 1 by virtue of their dependency upon the independent claim and by virtue of their additional limitations.

Amended Claim 12 recites a method for providing an electronic coupon to a user of an electronic document, the method comprising, *inter alia*, “using each of a plurality of recognizer modules to determine a number of strings in a database that match at least one string in the electronic document”, “recognizing the matched strings by labeling the matched strings in the

electronic document associated with each of the plurality of recognizer modules, wherein the label is stored along with the electronic document, and wherein the recognized string and the associated label are part of a semantic category associated with the recognized string”, “providing a plurality of actions in association with the recognized strings based on the associated semantic category”, “...providing a coupon associated with a web site as one of the plurality of actions”, and “passing an identifier associated with the semantic category of a selected action to the web site associated with the coupon such that instances of the provided action are tracked.”

As discussed above, *Pandit*, *Perkowski*, and *Gupta* do not teach or suggest recognizing the matched strings by labeling the matched strings in the electronic document associated with recognizer modules, where the label is stored along with the electronic document and the recognized string and the associated label are part of a semantic category associated with the recognized string. Neither do the three references disclose providing a plurality of actions in association with the recognized strings based on the associated semantic category.

*Jovicic* discloses an electronic coupon communication system, comprising a network node for selecting, receiving and printing electronic coupons over a public computer network such as the Internet, the node including a display coupled to a control processing unit for displaying at least one electronic coupon, a memory for storing electronic coupons received through electronic transmission from an Internet Coupon Server, which memory permits browsing on the display, a user input device coupled to the central processing unit to permit a user to make an on-line selection of one of a plurality of electronic coupons collectively stored in the Internet Coupon Server's memory. (*See Jovicic* column 4 lines 17-53.) Thus, *Jovicic* also fails to teach or suggest the above listed features of amended claim 12.

Moreover, the four references, combined or individually, also do not teach determining whether the number of recognized strings exceeds a predetermined minimum or passing an identifier associated with the semantic category of a selected action to the web site associated with the coupon such that instances of the provided action are tracked as recited in the claim. Therefore, claim 12 is not rendered obvious by the cited references. Notice to that effect is respectfully requested.

Claim 13 depends from claim 12 with additional features and is therefore allowable for at least the same reasons as those discussed for claim 12.

Amended Claim 19 recites a computer-implemented method for using a recommendation e-mail from an e-commerce retailer to a computer, comprising, *inter alia*, “receiving an e-mail from the retailer, wherein the e-mail comprises a product name of a product for sale by the retailer”, “cross-referencing the product name with a type label database to determine whether the product name matches at least one entry in the type label database, wherein the step of cross-referencing the product name with a type label database to determine whether the product name matches at least one entry in the type label database is performed by a plurality of recognizer modules on the computer”, “labeling the product name with a type label associated with each of the plurality of recognizer modules, wherein the product name, its associated type label, and a URL of a web site associated with the product name are part of a semantic category, and wherein the type label is stored along with one of the e-mail and an associated document”, and “cross-referencing each type label with a plurality of actions to determine which actions match each type label based on the associated semantic category.”

As mentioned before, *Jovivich* in combination with the other three references does not teach or suggest labeling the product name with a type label associated with recognizer modules,

where the product name, its associated type label, and a URL of a web site associated with the product name are part of a semantic category, and the type label is stored along with the e-mail or an associated document. The references also do not disclose cross-referencing each type label with a plurality of actions to determine which actions match each type label based on the associated semantic category. Thus, amended claim 19 is also not rendered obvious by *Pandit*, *Perkowski*, *Gupta*, or *Jovivich*, and is condition for allowance. Notice to that effect is respectfully requested.

Claim 21 depends from claim 19 with additional features and is therefore allowable for at least the same reasons as those discussed for claim 19. Claims 14 and 15 have been cancelled without prejudice or disclaimer.

### CONCLUSION

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicant's attorney at the number listed below.

Respectfully submitted,

MERCHANT & GOULD



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\_\_\_\_\_  
Carl K. Turk  
Reg. No. 59,675

Merchant & Gould, LLC  
P.O. Box 2903  
Minneapolis, Minnesota 55402-0903  
Telephone: 404.954.5100

